

COMMENTS ON RM-10786

Gentlemen,

Proponents of the abolition of the Morse code requirement for the Amateur Radio license examination have put forth six main supportive arguments. I will go through each argument, followed by my response.

1. CW is just another mode and should not be afforded any special priority over others. It is available to those who wish to use it. Morse proficiency should not be required for those who do not wish to use the mode

Response: I agree that CW is “just another mode and should not be afforded any special priority over others”. However, the role of the amateur radio syllabus and examination is to equip new amateurs with the abilities they need for basic competence in ALL popular and useful modes. One of these popular and useful modes is CW and the ability for CW is Morse code. If the above argument for removing Morse is correct, then similarly, those who do not wish to use phone should not be required to demonstrate proficiency in phone operating techniques. Generalizing from modes to other aspects of amateur radio, those who do not wish to build or maintain their own equipment should not be required to demonstrate proficiency in basic electronics. If taken seriously, this position would result in a syllabus where all components are optional. This is clearly a ridiculous position.

2. Manual radiotelegraphy communications has been superceded by more modern, reliable, accurate, faster and efficient means of communication.

Response: This is true in the commercial and military services where traffic volume is the primary consideration, where good signal strength can be assured and where there are few restrictions on equipment, bandwidth, antennas and power level. However, this is NOT true of the amateur service, where CW remains one of the best modes of communication given the cost, power and bandwidth limitations we operate under, and given that traffic volume is not the primary concern

3. The Morse code requirement serves as an advancement barrier to many otherwise qualified individuals.

Response: True BUT Electronics theory also serves as a barrier to many people who would otherwise make good operators. I personally have known people who could do the Morse code but got stymied with the electronic theory and gave up. In my view this is not a good reason to eliminate the electronic theory from the syllabus. Neither is it a reasonable justification for eliminating the Morse code test from the examination. I have yet to see a good argument from anyone as to why they cannot manage the Morse component of the syllabus. If a person doesn't have the time or interest to pass any other component of the syllabus, then you won't get a license. Why should Morse code be any different? Besides, if a person has a real physical or mental problem that makes it unreasonably hard for him/her to pass the Morse test, then an exemption can be obtained and the code test waived.

4. Requiring manual telegraphy proficiency is not compatible with the radio amateur's mandated objective of contributing to the advancement of the radio art.

Response: I agree BUT neither is requiring knowledge of AM or SSB modulation, or of discrete electronics, or of ionospheric propagation when much greater efficiency can be achieved using satellites or fiber-optic devices. Knowledge of how dipole and quarter-wave vertical antennas work cannot be considered a contribution to the advancement of the art in antennas. However, this does not invalidate the Morse component, since contributing to the advancement of the art is only one of the radio amateur's Basis and Purposes (97.1), not the only one.

5. The value of Morse code communications in the Amateur Service is primarily recreational in nature so therefore manual telegraphy proficiency should no longer be a compulsory licensing requirement for any class of the Amateur Radio license.

Response: I agree that the value of Morse code communications is largely recreational. However, this misses the point that the same can be said for all modes of operation. The fact is, Amateur Radio is largely recreational, with occasional forays into emergency communications. So if this is a good reason not to teach CW competence, then it is an equally good reason not to teach competence in SSB, FM RTTY, Pactor, PSK31 and Packet, as the use of all these modes in the Amateur is also "primarily recreational in nature".

6. No evidence exists that Morse proficiency is an indicator of a desirable, motivated or better qualified operator

Response: I have operated CW, SSB and FM for many years and can say with confidence that there are less poor operating problems with CW operators than with phone operators. This is borne out in the pages of QST with reports from the FCC's enforcement man (Hollingsworth) dealing with enforcement problems on VHF repeaters and interference problems on HF SSB. The most recent problem is the issue of wide-band SSB interference, with SSB signals occupying up to 9 Khz of bandwidth instead of the normal 2.5 Khz. You don't see this sort of problem on CW.

Unlike the rest of the world, where local laws prohibit usurping phone company business, the USA amateur radio community has for many years been involved in operating a nationally coordinated message handling service called the National Traffic System (NTS). This system operates on CW, SSB, FM and digital modes. The NTS is not designed to handle large volume traffic but rather to involve a large number of amateur radio operators in handling mostly incidental ("routine") traffic. Picture NTS as a National Volunteer Communications Corps that functions every day, every night. The implication of how this ties in to National Security should be obvious. In an emergency, the NTS infrastructure (operators, equipment, nets) is in place and is able to be of service. All modes in the NTS are important to assure the continuation of this volunteer communications organization. The CW mode plays a very important role in the National Traffic System. All of the evening HF NTS nets operate on the CW mode and handle many pieces of traffic every night. For example, tune a receiver to 7052 Khz at 8:30PM EDT and you'll hear the Eastern Area CW Traffic Net coordinating the routing of incoming and outgoing traffic for the Eastern Area of the NTS organization. The daytime

nets are all on SSB and the digital modes are largely bulletin board operations. The entry of good CW operators into the NTS organization is vital to the functioning of this volunteer service.

Since we need more good CW operators for message handling, to remove the Morse requirement from the Amateur Radio syllabus and examination would assure the dilution, if not the demise, of the National Traffic System., We also need more good SSB operators but that's another issue.

This paper shows that within the Amateur Radio Service, CW is currently a viable mode. CW is both a useful and popular mode of communication amongst Amateur Radio Operators. I have attempted to argue that a key purpose of our training and examination syllabus is to equip new amateurs with the basic abilities they need to make use of ALL useful and popular modes, and that in the case of CW, this means training and examining candidates in Morse code.

Doing away with the Morse code requirement could result in the decline or even the eventual demise of an important mode that offers many advantages for today's amateurs. It would compromise our ability to provide emergency communications. Doing away with Morse means accepting the need for higher power and more complex and expensive antenna systems in order to communicate effectively under poor propagation conditions which will, in turn, reduce the appeal of amateur radio. Eliminating the Morse requirement would also compromise parts a through e of Part 97.1, Basis and Purpose of the Amateur service.

Retaining the Morse code requirement is in the best interest of Amateur Radio. I therefore recommend that the Federal Communications Commission support the retention of a Morse code requirement for the issuing of amateur radio licenses.

Respectively,

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